

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

WILD VIRGINIA, et al.,

Plaintiffs,

v.

COUNCIL ON ENVIRONMENTAL
QUALITY, et al.,

Defendants.

Civ. No. 3:20-cv-45-NKM

Hon. Norman K. Moon

**PROPOSED INTERVENOR-DEFENDANTS' MOTION TO INTERVENE AS
DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 24, proposed Intervenor-Defendants American Farm Bureau Federation, American Fuel & Petrochemical Manufacturers, American Forest Resource Council, American Petroleum Institute, American Road & Transportation Builders Association, Chamber of Commerce of the United States of America, Federal Forest Resource Coalition, Interstate Natural Gas Association of America, and National Cattlemen's Beef Association (the "Business Associations") hereby move to intervene as defendants in this action. In support of this motion, the Business Associations will rely upon the accompanying Brief in Support of Motion to Intervene as Defendants; the Declarations attached as Exhibits 1-8 to this motion; any reply brief submitted in support of the motion; and any oral argument permitted at a hearing on the motion.

Dated: August 21, 2020

Respectfully submitted,

/s/ Joshua D. Rogaczewski

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** pro hac vice motion pending*